

LSK&D #: 574-6178 / 896564  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Application of

RAMY LAKAH and MICHEL LAKAH,

Petitioners,  
-against-

**Index No.: 07-CV-2799**

**REPLY DECLARATION  
OF LAWRENCE A.  
STECKMAN**

for a judgment pursuant to Article 75 of the  
C.P.L.R. staying the arbitration commenced by

UBS AG, EXPORTERS INSURANCE  
COMPANY, LTD., ARAB BANKING  
CORPORATION, NATIONAL BANK OF ABU  
DHABI and NATIONAL BANK OF OMAN,

Respondents.

Lawrence A. Steckman, declares as follows:

1. I am a member of LESTER SCHWAB KATZ & DWYER, LLP, attorneys for petitioners RAMY LAKAH and MICHEL LAKAH. I submit this reply declaration in further support of petitioners' motion for an order permanently staying the arbitration.

2. Petitioners electronically filed with the court today the following documents in further support of their motion for judgment staying the arbitration:

- (a) Reply declaration of Gamil Halim ("GH") and attached exhibits;
- (b) Reply declaration of Dr. Ibrahim Ahmed Ibrahim ("IA") and attached exhibits;
- (c) Reply declaration of Michel Lakah ("ML") and attached exhibits;
- (d) Reply declaration of Brian Murphy ("MU") and attached exhibits;
- (e) Reply declaration (no. 1) of Sherif George Halim ("SG1") and attached exhibits;

(f) Reply declaration (no. 2) of Sheriff George Halim ("SG2") and attached exhibits; and

(g) Reply declaration of Lawrence A. Steckman

(h) Reply memorandum of law.

3. WHEREFORE, petitioners respectfully request that the arbitration be stayed as to both Ramy Lakah and Michel Lakah.

4. Under penalty of perjury the foregoing is true and correct.

Executed on July 9, 2007



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Lawrence A. Steckman